



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 11, 2022

**By ECF**

The Honorable Alison J. Nathan, Sitting by Designation  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re:     *United States v. Ghislaine Maxwell, S2 20 Cr. 330 (AJN)***

Dear Judge Nathan:

The Government respectfully moves for the exclusion of time for Counts Seven and Eight under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), until June 28, 2022—the scheduled date of sentencing. Although the Government currently intends to move to dismiss these counts at sentencing, as it has previously stated (*see* Dkt. No. 574), the Government seeks this exclusion of time in an abundance of caution, so the Act does not preclude prosecution in the unlikely event an intervening development occurs between now and sentencing which causes the Government to reconsider that position. Such an exclusion promotes the ends of justice by obviating any need for the parties and the Court to prepare for a second trial which, barring unforeseen developments, will not occur. *See* 18 U.S.C. § 3161(h)(7)(A). Defense counsel consents to this exclusion.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/

Maurene Comey  
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Assistant United States Attorneys  
Southern District of New York

Cc: Defense Counsel (by ECF)